

THE HONORABLE JAMAL N. WHITEHEAD

1  
2  
3  
4  
5  
6  
7  
8  
9

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

## VALVE CORPORATION

No. 2:24-CV-1717-JNW

Plaintiff,

V.

THOMAS ABBRUZZESE *et al.*,

**REPLY DECLARATION OF  
ANDREW J. FUCHS IN FURTHER  
SUPPORT OF VALVE  
CORPORATION'S MOTION FOR  
PRELIMINARY INJUNCTION**

## Defendants.

10

19  
20  
21  
22  
23  
24  
25  
26  
27

DECLARATION OF ANDREW J. FUCHS - 1  
No. 2:24-CV-1717-JNW

**CORR CRONIN LLP**  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104-1001  
Tel (206) 625-8600  
Fax (206) 625-0900

**REPLY DECLARATION OF ANDREW J. FUCHS**

I, Andrew J. Fuchs, declare as follows:

1. I am an attorney licensed to practice in the State of Texas and a counsel in the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Plaintiff Valve Corporation (“Valve”) in the above-captioned matter. I submit this declaration in further support of Valve’s Motion for Preliminary Injunction.

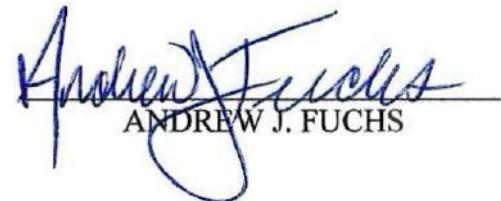
2. The majority of arbitrators presiding over arbitrations brought by Bucher Law PLLC against Valve Corporation entered orders staying arbitrations before them. This declaration attaches at Exhibits 14-18 examples of such orders.

3. I also submit this declaration to transmit to the Court true and correct copies of the following documents that are attached hereto:

<b>DESCRIPTION</b>	
Exhibit 14	Arbitrator Brooks Order dated Oct. 23, 2024, <i>Joshua Sayles &amp; 21 Other Individual Claimants v. Valve Corp.</i>
Exhibit 15	Arbitrator Gruber Order dated Oct. 28, 2024, <i>Trevor Rupel &amp; 27 Other Individual Claimants v. Valve Corp.</i>
Exhibit 16	Arbitrator Thompson Order dated Nov. 11, 2024, <i>William Marcellus &amp; 1 Other Individual Claimant v. Valve Corp.</i>
Exhibit 17	Arbitrator McNamara Order dated Dec. 11, 2024, <i>Meagan Argo &amp; 1 Other Individual Claimant v. Valve Corp.</i>
Exhibit 18	Arbitrator Mainland Order dated Dec. 20, 2024, <i>James Mcinerney &amp; 24 Other Individual Claimants v. Valve Corp.</i>
Exhibit 19	Arbitrator Dasteel Order dated June 11, 2025, <i>In re Valve Corp.</i>
Exhibit 20	Defendant Valve Corporation's Opposition to Plaintiff Ryan Lally's Motion for Sanctions, <i>In re Valve Antitrust Litigation</i> , No. 2:21-cv-00563-JNW (W.D. Wash. filed June 26, 2025) (Dkt. 470)

1 I declare under penalty of perjury that the foregoing is true and correct.  
2

3 Dated: October 3, 2025 in Austin, Texas  
4

  
5 ANDREW J. FUCHS  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

---

27 DECLARATION OF ANDREW J. FUCHS - 2  
28 No. 2:24-CV-1717-JNW

CORR CRONIN LLP  
1015 Second Avenue, Floor 10  
Seattle, Washington 98104-1001  
Tel (206) 625-8600  
Fax (206) 625-0900